

10/26/15 Mtg w/ Maxine et al + SC on SO₂

- SC-sent several folks from Beyond Coal campaign
- Mike J: will largely in listening mode
- Maxine
 - 4 large units around St. Louis area - 3 w/o scrubbers - RI and Labadie
 - Disagree with MDNR
 - ① Jefferson Co SIP
 - "EPA has gone on record saying it did not meet the requirements of the CAA" (in cmt letter, and MDNR did not address our comments)
 - ② Labadie - unclassifiable designation, should be NA - if modeling done correctly, it's NA. The monitoring data is inadequate (location and not 3 full years)
 - ③ Monitor locations - installed 2 monitors around Labadie and proposed 3 monitors around RI. These are part of 2015 monitoring ^{network} plan as special purpose monitors. These monitors are not in peak emissions areas so should not be used for regulatory designation purposes.

① Jefferson Co SIP

- Maxine believes MDNR's response to our cmts were nonresponsive
- Attainment demo does not show attainment of the std.
- Real concern with RI b/c if not addressed in this SIP, they will ~~not~~ escape SO₂ NAAQS process
 - ↳ Not subject to DRR or CD
 - ↳ Language in the preamble may suggest otherwise
- Maxine - They don't have all the pieces b/c did not submit a SIP/demo based on allowable emissions throughout area
- For SC - it's a temporal issue - asking RT to reject the SIP sooner rather than later.
- 12-13 SO₂ sources in RT subject to the CD
- Jackson Co. SIP now in house - as of mid-Oct.

② Labadie - Round 2 CD source

- Maxine - Do not have 3 years worth of monitoring data, so have to do modeling - 3 modeling analyses - MDNR (shared NA); SC (shared NA); Ameren (attain)
- State has recommended unclassifiable rec.
- Ameren used lower background; used different assumptions - different from EPA methodology
 - ↳ Ameren also did modeling run using EPA protocol and got higher numbers (Ameren used more accurate variable stack parameter information).
 - ↳ yes - was submitted
- Maxine - Modeling that followed EPA protocol shared NA (with some differences in MET data and resulting spacial representation of NA area)
- MDNR relied on a State law - 643.650
 - 1st section is all about Jefferson Co - Ameren
 - 2nd section seems to be all about DRR
 - 3rd section refers back to section 1
 - ↳ only says "shall consider"

③ Monitor locations and purpose

Labadie locations are important b/c Maxine feels that Ameren plans to use that data to show attain.

- Monitors are not in locations ^{MET} of areas of peak concen.
- Chesterfield data suggests other monitors are not in areas of peak concentrations
 - ↳ Another analysis from a diff station suggests one monitor is ok, but Valley monitor still inappropriate
- Monitors are included in 2015 Monitoring Network Plan as special purpose monitors
 - ↳ understand Am wants to move to propose them as SIAMS monitors.
- Asking us to notify Am and MDNR that we have concerns with monitor placement and will not be used for designation purposes.
- R7 commented on monitors in SO₂ cmt letter
- Monitors are included under contingency plan req.
- Am proposed 3 locations to MDNR, submitted modeling did

(RI)

MDNR

did
1.1.w

- Issues with locations of those monitors - modeling does not show them to be in the location of peak concentration
- Taking into account ability to site a monitor at a location?
 - ↳ Not apparent to Makin's group why monitors were placed (75-80% less) - does not appear to be siting ability issues.
- Importance of monitors b/c believe that the monitors are the "end game" for Ameren - plan to use to show clean data for purposes of designations